NRDC
THE EARTH'S BEST DEFENSE

NATURAL RESOURCES DEFENSE COUNCIL

April 13, 2005

APR 15 2005

Lucetta Dunn, Director
CA Department of Housing and Community Development
1800 Third Street
P.O. Box 952050
Sacramento, CA 94252-2050

**RE: Approval of CPVC (State Clearinghouse No. 2000091089) - Oppose**

Dear Ms. Dunn:

On behalf of NRDC (Natural Resources Defense Council), which has over one million members and activists, more than 250,000 of whom are Californians, I am writing to express serious concerns about the health and environmental impacts of the proposal of the Department of Housing and Community Development ("HCD") to approve chlorinated polyvinyl chloride (CPVC) drinking water pipe for statewide use in residential buildings. (State Clearinghouse No. 2000091089).

HCD's proposal would require all cities and local jurisdictions in California to allow the use of CPVC in any residential building. Before HCD makes a decision with such major environmental and health implications, the agency should fully study CPVC in an environmental impact report (EIR). An addendum to a 2000 Mitigated Negative Declaration for a much narrower CPVC approval, (allowing CPVC only in limited areas of the state with water or soil so corrosive that it would corrode metallic pipe), is simply not an adequate substitute for a full EIR.

A study recently released by the San Francisco Department of the Environment assessed the environmental impacts of various plastic pipe materials. The study compared the chemical hazards, performance, and recyclability of various materials. The study concluded that CPVC pipe should be avoided for use in water systems because it generates highly toxic chemicals throughout its lifecycle, and because these toxic chemicals can leach into drinking water. The study also concluded that CPVC is very difficult to recycle and adds to burdens on landfills.

I urge you to prepare an environmental impact report ("EIR") prior to proceeding with any approval of CPVC for drinking water pipe to analyze the environmental impacts of CPVC, to consider alternative pipe materials, and to consider feasible mitigation measures.

Sincerely,

Gina Solomon

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Senior Scientist

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